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Payment of Premium by Checks of Municipal Corporation.—In *City of Newburyport v. Fidelity Mut Life Ins. Co.*, 84 Northwestern Reporter, 111, the Supreme Judicial Court of Massachusetts held that the city was entitled to recover the amount of its checks, paid by its treasurer on his life insurance policy. As the checks showed on the face that they were the city's, the agent must have known that the treasurer was using its funds for individual purposes, and his knowledge was imputable to the company. The negligence of the auditing officers of the city in not sooner discovering the acts of the treasurer was held no defense in an action to recover the funds.

Protection of Uncopyrighted Post Cards.—Because post cards do not identify and distinguish the products of the manufacturer, but constitute the product itself, the United States Circuit Court, E. D. Pennsylvania, held that uncopyrighted post cards are not entitled to protection as trade-marks. In *Bamforth v. Douglass Post Card & Machine Company*, 158 Federal Reporter, 355, defendants duplicated post cards by the half-tone process, and sold them for a much lower price than the originals. A photograph, which is the result of original intellectual conception of the author, may be copyrighted with the same effect as if it were a book; but, without such protection, neither book nor photograph continues to be the author's exclusive property after it has been printed and offered for sale.

Insurable Interest.—Plaintiff made an agreement with insured whereby he was to pay premiums on certain policies on the life of insured, taken out for the benefit of his children, until his death. Plaintiff was to be reimbursed, upon payment of the policies, for premiums paid with interest, together with a certain substantial sum. The New York Court of Appeals in *Reed v. Assurance Society*, 82 Northeastern Reporter, 734, held the contract valid, and that, as the insurance was effected by plaintiff under the agreement upon the insurable interest of the children, he could be held to its performance as their trustee if necessary.

Enactment of Municipal Ordinance.—A city charter provided that every ordinance must be read three times before final passage, and not more than twice at any one meeting. After a certain ordinance had been read twice, the terms of half the members expired, and new ones were elected. This new board then finally passed the ordinance. Its validity was questioned in *Paterson & Ramapo R. Co. v. City of Paterson*, 68 Atlantic Reporter, 76, where the Court of Errors and Appeals of New Jersey held that the ordinance fell with the expiration of the original board, and that its attempted enactment by the succeeding board was invalid.